



ASTRUMSOLAR®

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August 15, 2011

Via Email to: DOER.SREC@massmail.state.ma.us

Re: Astrum Solar, Inc. – Comments in Support of the Proposed Solar ACP Rate Schedule

Thank you for the opportunity to provide these comments regarding DOER's August 2, 2011 Announcement on ACP Rate Schedule. Astrum Solar, Inc. strongly supports the proposal.

By way of background, Astrum Solar is the leading full-service residential solar provider headquartered in the Eastern United States, serving homeowners and small businesses in Delaware, Maryland, Massachusetts, Michigan, New Jersey, New York, Ohio, Pennsylvania, Virginia, Washington, D.C. and West Virginia. The company is also one of the nation's largest aggregators of residential Solar Renewable Energy Credits ("SRECs") and the only home solar installer offering upfront value for the SRECs many homeowners receive when they install solar panels.

Astrum Solar stands firmly in support of the adoption of the proposed ten year forward schedule for solar ACPs.

When Astrum Solar examines which markets to enter, a critical factor is the state or local commitment to long-term clean alternative energy development. A ten year forward schedule for solar ACPs demonstrates such a long-term commitment to solar development, which is a signal to Astrum and other solar providers that Massachusetts is a place to establish a stable business.

Moreover, a ten year forward solar ACP schedule will promote customer confidence in the decision to "go solar" by providing a clear value for customer SRECs for an extended period of time. This in turn will help to remove customer uncertainty, which is one of the main reasons customers hesitate to move forward installations. Accordingly, a ten year forward schedule for solar ACPs will promote the overall growth of residential solar in Massachusetts.

DOER's proposed solar ACP values are appropriate.

In its proposal, DOER seeks to maintain the solar ACP at its current level through Compliance Year 2013, and then reduce the solar ACP by five percent per year. Astrum Solar believes that this gradual reduction in solar ACPs is appropriate, and demonstrates a reasonable level of support for the development of solar in accordance with the goals of the State of Massachusetts. Additionally, the solar ACP schedule proposed through 2021 falls in line with Astrum Solar's own projections, which further indicates the proposed schedule will aid in maintaining price levels necessary to maintain robust solar development.

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DOER has developed a proposal for a ten year rolling solar ACP schedule that will reduce uncertainty both for solar installation companies and for customers. This proposal will help Massachusetts meet its solar goals by providing a stable environment for businesses like Astrum Solar to grow. Astrum Solar supports the proposal in full as drafted, and urges DOER to adopt it as soon as possible.

Thank you for your time and attention to this matter. Please feel free to contact me if I can provide any additional information.

Respectfully submitted,

Melanie Santiago-Mosier

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